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*Co-Counsel for Debtors and*

*Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

BED BATH & BEYOND INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 23-13359 (VFP)

(Jointly Administered)

**APPLICATION FOR ORDER SHORTENING TIME**

TO THE HONORABLE VINCENT F. PAPALIA, UNITED STATES BANKRUPTCY JUDGE:

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) by and through their undersigned counsel request that the time period to notice a hearing on the

<sup>1</sup> The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these Chapter 11 Cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 650 Liberty Avenue, Union, New Jersey 07083.

*Debtors' Motion for Entry of an Order (I) Authorizing (A) Rejection of Certain Unexpired Leases and (B) Abandonment of Any Personal Property, Effective as of the Rejection Date and (III) Granting Related Relief* (the "Motion"),<sup>2</sup> as required by Fed. R. Bankr. P. 2002 be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and respectfully submit:

1. A shortened time hearing is requested because: As more fully described in the *Declaration of Holly Etlin, Chief Restructuring Officer and Chief Financial Officer of Bed Bath & Beyond Inc., in Support of the Debtors' Chapter 11 Petitions and First Day Motions* [Docket No. 10], the Debtors commenced these Chapter 11 Cases to implement an expedited process to maximize the value of the Debtors' estates for the benefit of all stakeholders. Given the fast pace of these Chapter 11 Cases, the Debtors believe, in their business judgment, that authorizing the Debtors to reject the Leases (as defined in the Motion) is in the best interest of the estates. Prompt rejection of the Leases will allow the Debtors to avoid any unnecessary rent payments and related obligations with respect to the Leases as the Debtors will have ceased operations at, and will no longer be in possession of, such store locations. Accordingly, it is imperative that the Motion is heard as soon as practicable. The Debtors do not believe that any party will be prejudiced by the shortened notice for a hearing, and the Lenders have not objected to the proposed rejection.

2. State the hearing dates requested: The Debtors respectfully request that the Court hear the Motion on August 16, 2023, at 2:30 p.m., prevailing Eastern Time, the date that the Debtors and parties in interest are scheduled to appear before the Court for the Debtors' August omnibus hearing.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

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<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

**WHEREFORE**, the Debtors respectfully request entry of the proposed order shortening time, in substantially the form submitted herewith, granting the relief requested herein and such other relief as is just and proper under the circumstances.

Dated: July 28, 2023

*/s/ Michael D. Sirota*

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